

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Leila Green Little, *et al.*,
Plaintiffs,
v.
Llano County, *et al.*,
Defendants,
And
The State of Texas,
Intervenor-Defendant.

Case No. 1:22-CV-00424-RP

**DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUESTS FOR PRODUCTION TO
DEFENDANT AMBER MILUM, SET ONE**

TO: **Plaintiffs**, Leila Green Little, et al., by and through their attorneys of record, Ellen Leonida, BraunHagey & Borden, LLP, 351 California Street, 10th Floor, San Francisco, CA 94104, and Ryan A. Botkin, Wittliff | Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701;
Defendants, Llano County, et al., by and through their attorneys of record, Dwain K. Rogers, Llano County Attorney, Matthew L. Rienstra, First Assistant County Attorney, 801 Ford Street, Llano, Texas 78643, and by Intervenor, Ken Paxton, Attorney General of Texas, Brent Webster, First Assistant Attorney General, Shawn E. Cowles, Deputy Attorney General for Civil Litigation, Christopher D. Hilton, Chief, General Litigation Division, Landon A. Wade, Attorney in Charge, P.O. Box 12548 (MC-019), Austin, Texas 78711.

COMES NOW Defendant, Amber Milum, in the above entitled and numbered cause and serves her objections and answers to Plaintiff's First Set of Discovery Requests.

Respectfully submitted,



Dwain K. Rogers

Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra

First Assistant County Attorney
Texas Bar No. 16908020
Llano County Attorney's Office
Llano County Courthouse
801 Ford Street
Llano, Texas 78643
(325) 247-7733

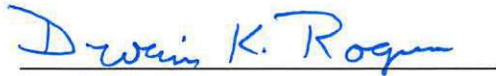
drogers@co.llano.tx.us

matt.rienstra@co.llano.tx.us

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants Objections, Answers, and Responses to Plaintiff's First Set of Discovery Requests was served by facsimile and electronic mail on this the 22nd day of June 2022, to the following:



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra
First Assistant County Attorney
Texas Bar No. 16908020

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matt.rienstra@co.llano.tx.us
Counsel for Defendants

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS and COMMUNICATIONS RELATED TO any MATERIALS currently or previously in the LIBRARY SYSTEM that allegedly contain INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made to the following definition, “INAPPROPRIATE CONTENT”, as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff’s complaint with any defensive contention regarding: “INAPPROPRIATE CONTENT”;
- c. The definitions are overbroad as applied to how the Llano County community views the term “INAPPROPRIATE” or its antonym Appropriate.

RESPONSE:

See *Milum 1 RFP 00001-00086*.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS and COMMUNICATIONS RELATED TO closing LIBRARY BOARD meetings to the public.

OBJECTION:

Objection to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

See *Milum 2 RFP 00087-00312*.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS and COMMUNICATIONS RELATED TO the suspension and/or termination of OVERDRIVE and YOUR consideration of other digital eBook and audiobook platforms or collections.

RESPONSE:

See *Milum 3 RFP 00313-00502*.

REQUEST FOR PRODUCTION NO. 4:

All DOCUMENTS SUFFICIENT to identify and COMMUNICATIONS RELATED TO all MATERIALS that have been RESTRICTED or removed from the LIBRARY SYSTEM's public locations on the basis of INAPPROPRIATE CONTENT, including all DOCUMENTS and COMMUNICATIONS RELATED TO the KRAUSE LIST.

OBJECTION:

Objection is made as to the definition of "INAPPROPRIATE CONTENT," as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff's complaint with any defensive contention regarding: "INAPPROPRIATE CONTENT";
- c. The definition is overbroad as applied to how the Llano County community views the term "INAPPROPRIATE" or its antonym Appropriate.

Objection is made as to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

See *Milum 4 RFP 00503-00643*.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS identifying and DOCUMENTS SUFFICIENT to identify all MATERIALS that the LIBRARY BOARD intends or plans to RESTRICT or remove from the LIBRARY SYSTEM in the future on the basis of INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made as to the definition of "INAPPROPRIATE CONTENT," as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff's complaint with any defensive contention regarding: "INAPPROPRIATE CONTENT";
- c. The definition is overbroad as applied to how the Llano County community views the term "INAPPROPRIATE" or its antonym Appropriate.

Objection is made as to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

There are no responsive documents, although Defendants will supplement if responsive documents are discovered.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS and COMMUNICATIONS RELATED TO the criteria, policies, and/or procedures applied by the LIBRARY BOARD and the COLLECTION REVIEW COMMITTEE in determining which MATERIALS to RESTRICT or remove from the LIBRARY SYSTEM.

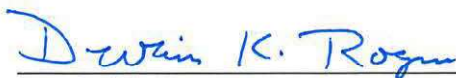
OBJECTION:

Objection to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

There are no responsive documents, although Defendants will supplement if responsive documents are discovered.

SIGNED on June 22, 2022.



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra

First Assistant County Attorney
Texas Bar No. 16908020

Llano County Attorney's Office
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Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
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AUSTIN DIVISION**

Leila Green Little, *et al.*,
Plaintiffs,
v.
Llano County, *et al.*,
Defendants,
and
The State of Texas,
Intervenor-Defendant.

Case No. 1:22-CV-00424-RP

**DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUESTS FOR PRODUCTION TO
DEFENDANT BONNIE WALLACE, SET ONE**

TO: **Plaintiffs**, Leila Green Little, et al., by and through their attorneys of record, Ellen Leonida, BraunHagey & Borden, LLP, 351 California Street, 10th Floor, San Francisco, CA 94104, and Ryan A. Botkin, Wittliff | Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701;
Defendants, Llano County, et al., by and through their attorneys of record, Dwain K. Rogers, Llano County Attorney, Matthew L. Rienstra, First Assistant County Attorney, 801 Ford Street, Llano, Texas 78643, and by Intervenor, Ken Paxton, Attorney General of Texas, Brent Webster, First Assistant Attorney General, Shawn E. Cowles, Deputy Attorney General for Civil Litigation, Christopher D. Hilton, Chief, General Litigation Division, Landon A. Wade, Attorney in Charge, P.O. Box 12548 (MC-019), Austin, Texas 78711.

COMES NOW Defendant, Bonnie Wallace, in the above entitled and numbered cause and serves her objections and answers to Plaintiff's First Set of Discovery Requests.

Respectfully submitted,

By: 

Dwain K. Rogers

Attorney in Charge

Texas Bar No. 00788311

County Attorney

Matthew L. Rienstra

First Assistant County Attorney

Texas Bar No. 16908020

Llano County Attorney's Office

Llano County Courthouse

801 Ford Street

Llano, Texas 78643

(325) 247-7733

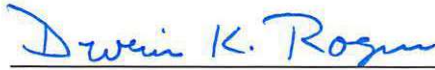
drogers@co.llano.tx.us

matt.rienstra@co.llano.tx.us

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants Objections, Answers, and Responses to Plaintiff's First Set of Discovery Requests was served by facsimile and electronic mail on this the 22nd day of June 2022, to the following:



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra
First Assistant County Attorney
Texas Bar No. 16908020

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matt.rienstra@co.llano.tx.us
Counsel for Defendants

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

ALL DOCUMENTS and COMMUNICATIONS RELATED TO any MATERIALS currently or previously in the LIBRARY SYSTEM that allegedly contain INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made as to the definition of “INAPPROPRIATE CONTENT,” as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff’s complaint with any defensive contention regarding: “INAPPROPRIATE CONTENT”;
- c. The definition is overbroad as applied to how the Llano County community views the term “INAPPROPRIATE” or its antonym Appropriate.

RESPONSE:

See *Wallace 1 RFP 00001-000018*.

REQUEST FOR PRODUCTION NO. 2:

ALL DOCUMENTS and COMMUNICATIONS RELATED TO closing LIBRARY BOARD meetings to the public.

OBJECTION:

Objection to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

See *Wallace 2 RFP 00019-00059*.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS and COMMUNICATIONS RELATED TO the suspension and/or termination of OVERDRIVE and YOUR consideration of other digital eBook and audiobook platforms or collections.

RESPONSE:

See *Wallace 3 RFP 00060-00115*.

REQUEST FOR PRODUCTION NO. 4:

All DOCUMENTS SUFFICIENT to identify and COMMUNICATIONS RELATED TO all MATERIALS that have been RESTRICTED or removed from the LIBRARY SYSTEM's public locations on the basis of INAPPROPRIATE CONTENT, including all DOCUMENTS and COMMUNICATIONS RELATED TO the KRAUSE LIST.

OBJECTION:

Objection is made as to the definition of "INAPPROPRIATE CONTENT," as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff's complaint with any defensive contention regarding: "INAPPROPRIATE CONTENT";
- c. The definition is overbroad as applied to how the Llano County community views the term "INAPPROPRIATE" or its antonym Appropriate.

Objection is made as to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

See *Wallace 4 RFP 00116-00117*.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS identifying and DOCUMENTS SUFFICIENT to identify all MATERIALS that the LIBRARY BOARD intends or plans to RESTRICT or remove from the LIBRARY SYSTEM in the future on the basis of INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made as to the definition of "INAPPROPRIATE CONTENT," as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff's complaint with any defensive contention regarding: "INAPPROPRIATE CONTENT";
- c. The definition is overbroad as applied to how the Llano County community views the term "INAPPROPRIATE" or its antonym Appropriate.

Objection is made as to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

See *Wallace 5 RFP 00118-00122*.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS and COMMUNICATIONS RELATED TO the criteria, policies, and/or procedures applied by the LIBRARY BOARD and the COLLECTION REVIEW COMMITTEE in determining which MATERIALS to RESTRICT or remove from the LIBRARY SYSTEM.

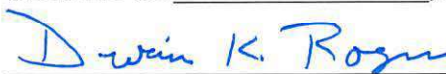
OBJECTION:

Objection to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

See *Wallace 6 RFP 00123-00138*.

SIGNED on June 22, 2022.



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra
First Assistant County Attorney
Texas Bar No. 16908020

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Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Leila Green Little, *et al.*,
Plaintiffs,
v.
Llano County, *et al.*,
Defendants,
and
The State of Texas,
Intervenor-Defendant.

Case No. 1:22-CV-00424-RP

**DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUESTS FOR PRODUCTION TO
DEFENDANT JERRY DON MOSS, SET ONE**

TO: **Plaintiffs**, Leila Green Little, et al., by and through their attorneys of record, Ellen Leonida, BraunHagey & Borden, LLP, 351 California Street, 10th Floor, San Francisco, CA 94104, and Ryan A. Botkin, Wittliff | Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701;
Defendants, Llano County, et al., by and through their attorneys of record, Dwain K. Rogers, Llano County Attorney, Matthew L. Rienstra, First Assistant County Attorney, 801 Ford Street, Llano, Texas 78643, and by Intervenor, Ken Paxton, Attorney General of Texas, Brent Webster, First Assistant Attorney General, Shawn E. Cowles, Deputy Attorney General for Civil Litigation, Christopher D. Hilton, Chief, General Litigation Division, Landon A. Wade, Attorney in Charge, P.O. Box 12548 (MC-019), Austin, Texas 78711.

COMES NOW Defendant, Jerry Don Moss, in the above entitled and numbered cause and serves his objections and answers to Plaintiff's First Set of Discovery Requests.

Respectfully submitted,

By: 

Dwain K. Rogers

Attorney in Charge

Texas Bar No. 00788311

County Attorney

Matthew L. Rienstra

First Assistant County Attorney

Texas Bar No. 16908020

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matt.rienstra@co.llano.tx.us

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants Objections, Answers, and Responses to Plaintiff's First Set of Discovery Requests was served by facsimile and electronic mail on this the 22nd day of June 2022, to the following:



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra
First Assistant County Attorney
Texas Bar No. 16908020

Llano County Attorney's Office
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(325) 247-7733
drogers@co.llano.tx.us
matt.rienstra@co.llano.tx.us
Counsel for Defendants

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS and COMMUNICATIONS RELATED TO any MATERIALS currently or previously in the LIBRARY SYSTEM that allegedly contain INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made as to the definition of “INAPPROPRIATE CONTENT,” as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff’s complaint with any defensive contention regarding: “INAPPROPRIATE CONTENT”;
- c. The definition is overbroad as applied to how the Llano County community views the term “INAPPROPRIATE” or its antonym Appropriate.

RESPONSE:

See *Moss 1 RFP 00001-00009*; also see documents produced by Llano County and Amber Milum.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS and COMMUNICATIONS RELATED TO closing LIBRARY BOARD meetings to the public.

OBJECTION:

Objection to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

See *Moss 2 RFP 00010-00016*; also see documents produced by Llano County and Amber Milum.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS and COMMUNICATIONS RELATED TO the suspension and/or termination of OVERDRIVE and YOUR consideration of other digital eBook and audiobook platforms or collections.

RESPONSE:

See *Moss 3 RFP 00017-00072*; also see documents produced by Llano County and Amber Milum.

REQUEST FOR PRODUCTION NO. 4:

All DOCUMENTS SUFFICIENT to identify and COMMUNICATIONS RELATED TO all MATERIALS that have been RESTRICTED or removed from the LIBRARY SYSTEM's public locations on the basis of INAPPROPRIATE CONTENT, including all DOCUMENTS and COMMUNICATIONS RELATED TO the KRAUSE LIST.

OBJECTION:

Objection is made as to the definition of “INAPPROPRIATE CONTENT,” as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff’s complaint with any defensive contention regarding: “INAPPROPRIATE CONTENT”;
- c. The definition is overbroad as applied to how the Llano County community views the term “INAPPROPRIATE” or its antonym Appropriate.

Objection is made as to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

There are no responsive documents, although Defendants will supplement if responsive documents are discovered.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS identifying and DOCUMENTS SUFFICIENT to identify all MATERIALS that the LIBRARY BOARD intends or plans to RESTRICT or remove from the LIBRARY SYSTEM in the future on the basis of INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made as to the definition of “INAPPROPRIATE CONTENT,” as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff’s complaint with any defensive contention regarding: “INAPPROPRIATE CONTENT”;
- c. The definition is overbroad as applied to how the Llano County community views the term “INAPPROPRIATE” or its antonym Appropriate.

Objection is made as to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

There are no responsive documents, although Defendants will supplement if responsive documents are discovered.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS and COMMUNICATIONS RELATED TO the criteria, policies, and/or procedures applied by the LIBRARY BOARD and the COLLECTION REVIEW COMMITTEE in determining which MATERIALS to RESTRICT or remove from the LIBRARY SYSTEM.


OBJECTION:

Objection is made as to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

There are no responsive documents, although Defendants will supplement if responsive documents are discovered.

SIGNED on June 22, 2022.

A handwritten signature in blue ink that reads "Dwain K. Rogers". The signature is written in a cursive style and is positioned above a horizontal line.

Dwain K. Rogers

Attorney in Charge

Texas Bar No. 00788311

County Attorney

Matthew L. Rienstra

First Assistant County Attorney

Texas Bar No. 16908020

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matt.rienstra@co.llano.tx.us

Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Leila Green Little, *et al.*,
Plaintiffs,
v.
Llano County, *et al.*,
Defendants,
and
The State of Texas,
Intervenor-Defendant.

Case No. 1:22-CV-00424-RP

**DEFENDANT'S RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION TO
DEFENDANT LLANO COUNTY, SET ONE**

TO: **Plaintiffs**, Leila Green Little, et al., by and through their attorneys of record, Ellen Leonida, BraunHagey & Borden, LLP, 351 California Street, 10th Floor, San Francisco, CA 94104, and Ryan A. Botkin, Wittliff | Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701;
Defendants, Llano County, et al., by and through their attorneys of record, Dwain K. Rogers, Llano County Attorney, Matthew L. Rienstra, First Assistant County Attorney, 801 Ford Street, Llano, Texas 78643, and by Intervenor, Ken Paxton, Attorney General of Texas, Brent Webster, First Assistant Attorney General, Shawn E. Cowles, Deputy Attorney General for Civil Litigation, Christopher D. Hilton, Chief, General Litigation Division, Landon A. Wade, Attorney in Charge, P.O. Box 12548 (MC-019), Austin, Texas 78711.

COMES NOW Defendant, Llano County, in the above entitled and numbered cause and serves its objections and answers to Plaintiff's First Set of Discovery Requests.

Respectfully submitted,

By: 

Dwain K. Rogers

Attorney in Charge

Texas Bar No. 00788311

County Attorney

Matthew L. Rienstra

First Assistant County Attorney

Texas Bar No. 16908020

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants Objections, Answers, and Responses to Plaintiff's First Set of Discovery Requests was served by facsimile and electronic mail on this the 22nd day of June 2022, to the following:



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra
First Assistant County Attorney
Texas Bar No. 16908020

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Counsel for Defendants

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS and COMMUNICATIONS RELATED TO any MATERIALS currently or previously in the LIBRARY SYSTEM that allegedly contain INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made to the following definition, “INAPPROPRIATE CONTENT”, as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff’s complaint with any defensive contention regarding: “INAPPROPRIATE CONTENT”;
- c. The definitions are overbroad as applied to how the Llano County community views the term “INAPPROPRIATE” or its antonym Appropriate.

RESPONSE:

See *Llano 1 RFP 00001-00030*.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS and COMMUNICATIONS RELATED TO closing LIBRARY BOARD meetings to the public.

OBJECTION:

Objection to the definition of “LIBRARY BOARD” as the proper name is “LIBRARY ADVISORY BOARD”.

RESPONSE:

Subject to the above objection, some documents have been withheld based on the Attorney Client and Attorney Work Product Privilege. A privilege log has been created.

See *Llano 2 RFP 00031-00094*.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS and COMMUNICATIONS RELATED TO the suspension and/or termination of OVERDRIVE and YOUR consideration of other digital eBook and audiobook platforms or collections.

RESPONSE:

See *Llano 3 RFP 00095-00242*; also see documents produced by Amber Milum.

REQUEST FOR PRODUCTION NO. 4:

All DOCUMENTS SUFFICIENT to identify and COMMUNICATIONS RELATED TO all MATERIALS that have been RESTRICTED or removed from the LIBRARY SYSTEM's public locations on the basis of INAPPROPRIATE CONTENT, including all DOCUMENTS and COMMUNICATIONS RELATED TO the KRAUSE LIST.

OBJECTION:

Objection is made as to the definition of "INAPPROPRIATE CONTENT," as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff's complaint with any defensive contention regarding: "INAPPROPRIATE CONTENT";
- c. The definition is overbroad as applied to how the Llano County community views the term "INAPPROPRIATE" or its antonym Appropriate.

Objection is made as to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

See documents produced by Amber Milum.

REQUEST FOR PRODUCTION NO. 5:

All COMMUNICATIONS identifying and DOCUMENTS SUFFICIENT to identify all MATERIALS that the LIBRARY BOARD intends or plans to RESTRICT or remove from the LIBRARY SYSTEM in the future on the basis of INAPPROPRIATE CONTENT.

OBJECTION:

Objection is made as to the definition of "INAPPROPRIATE CONTENT," as it:

- a. Assumes facts not in evidence;
- b. Not relevant, Defendant has not filed an answer to the Plaintiff's complaint with any defensive contention regarding: "INAPPROPRIATE CONTENT";
- c. The definition is overbroad as applied to how the Llano County community views the term "INAPPROPRIATE" or its antonym Appropriate.

Objection is made as to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

There are no responsive documents, although Defendants will supplement if responsive documents are discovered.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS and COMMUNICATIONS RELATED TO the criteria, policies, and/or procedures applied by the LIBRARY BOARD and the COLLECTION REVIEW COMMITTEE in determining which MATERIALS to RESTRICT or remove from the LIBRARY SYSTEM.

OBJECTION:

Objection to the definition of "LIBRARY BOARD" as the proper name is "LIBRARY ADVISORY BOARD".

RESPONSE:

See *Llano 6 RFP 00243-00267*.

SIGNED on June 22, 2022.



Dwain K. Rogers
Attorney in Charge
Texas Bar No. 00788311
County Attorney

Matthew L. Rienstra

First Assistant County Attorney
Texas Bar No. 16908020

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Counsel for Defendants